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VERSUS

#### UNITED STATES DISTRICT COURT

#### WESTERN DISTRICT OF LOUISIANA

### SHREVEPORT DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 15-00223-61

\* 18 U.S.C. § 2241(c)

\* Aggravated Sexual Abuse of a Minor

\*

\*

\* 18 U.S.C. § 2242(1)

Sexual Abuse

\* \* JUDGE FOOTE

SHAWN D. DRIGGERS

\* MAGISTRATE JUDGE HORNSBY

#### **INDICTMENT**

THE FEDERAL GRAND JURY CHARGES:

## COUNT 1

18 U.S.C. § 2241(c)

Aggravated Sexual Abuse of a Minor under the age of 12 years

Beginning on or about September 27, 2007, and continuing until on or about the January 14, 2008, in the Western District of Louisiana, in the special territorial jurisdiction of the United States at Barksdale Air Force Base, the defendant, SHAWN D. DRIGGERS, did knowingly engage, and attempt to engage, in sexual acts, as defined in Title 18, United States Code, Section 2246(2), with a person , who had not attained the age of 12 years, in violation of Title 18, United States Code, Section 2241(c). [18 U.S.C. § 2241(c)].

#### COUNT 2

18 U.S.C. § 2241(c)

Aggravated Sexual Abuse of a Minor between the ages of 12 and 16 years

Beginning on or about January 15, 2008, and continuing until an unknown date but reasonably near to the August 1, 2009, in the Western District of Louisiana, in the special territorial jurisdiction of the United States at Barksdale Air Force Base, the defendant, SHAWN D. DRIGGERS, did knowingly engage, and attempt to engage, in sexual acts, as

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defined in Title 18, United States Code, Section 2246(2), with a person , who was between the ages of 12 and 16 years, to engage in sexual acts as defined in Title 18, United States Code, Section 2246(2), in violation of Title 18, United States Code, Section 2241(c). [18 U.S.C. § 2241(c)].

COUNT 3
18 U.S.C. § 2242(1)
Sexual Abuse

On an unknown date between June 11, 2008 and October 4, 2008, in the Western District of Louisiana, in the special territorial jurisdiction of the United States at Barksdale Air Force Base, the defendant, SHAWN D. DRIGGERS, did knowingly cause and attempt to cause a person, , to engage in a sexual act, as defined in Title 18, United States Code, Section 2246(2), by threatening and placing in fear, all in violation of Title 18, United States Code, Section 2242(1). [18 U.S.C. § 2242(1)].

A TRUE BILL:

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FOREMAN OF THE GRAND JURY

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